**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§ § § § § § §	Chapter 11
STRUDEL HOLDINGS LLC and AVR AH LLC,		Case No. 23-90757 (CML)
		(Jointly Administered)
Debtors.[1]		

**NOTICE OF APPEARANCE, REQUEST FOR ALL
NOTICES, AND DEMAND FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that McKool Smith PC ("McKool Smith") appears on behalf

of Three Dolphins, LLC ("Three Dolphins") and hereby submits this notice of appearance in the

above-captioned proceedings (the "Chapter 11 Cases") and requests notice of all hearings and

conferences herein and make a demand for service of all papers herein, including all papers and

notices pursuant to Rules 2002, 3011, 3017, 5009, 9007, and 9010 (if applicable) of the Federal

Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Sections 342 and 1109(b) (if

applicable) of title 11 of the U.S. Code (the "Bankruptcy Code").

All notices given or required to be given in these Chapter 11 Cases shall be given to and

served upon McKool Smith at the following addresses:

> John J. Sparacino
> S. Margie Venus
> **McKool Smith, PC**
> 600 Travis Street, Suite 7000
> Houston, Texas 77002
> Telephone: (713) 485-7300
> Facsimile: (713) 485-7344
> Email: jsparacino@mckoolsmith.com
> Email: mvenus@mckoolsmith.com

---

[1] The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: AVR AH LLC (0148) and Strudel Holdings LLC (5426). The Debtors' service address is: PO Box 4068, Aspen, CO 81612.

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and sections of the Bankruptcy Code specified above, but also includes, without limitation, the schedules, statement of financial affairs, operating reports, any plan of reorganization or disclosure statement, any letter, application, motion, complaint, objection, claim, demand, hearing, petition, pleadings or request, discovery request, deposition notice, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, electronic mail, telephone, telegraph, telex or otherwise filed with or delivered to the Bankruptcy Clerk, Clerk, Court or Judge (as those terms are defined in Bankruptcy Rule 9001) in connection with and with regard to the above-referenced Chapter 11 Cases and any proceedings related thereto.

PLEASE TAKE FURTHER NOTICE that Three Dolphins intends that neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive: (i) the right of Three Dolphins to object and/or not consent to entry of final orders by a Bankruptcy Judge in non-core matters and request that final orders in non-core matters be entered only after de novo review by a District Judge; (ii) the right of Three Dolphins to a trial by jury in any proceedings so triable in these Chapter 11 Cases or any case, controversy or proceeding related to these Chapter 11 Cases; (iii) the right of Three Dolphins to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or, (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which Three Dolphins is or may be entitled under agreements, at law, in equity or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments the undersigned expressly reserves on behalf of Three Dolphins.

Dated: August 30, 2023

Respectfully submitted,

McKool Smith, PC

/s/ John J. Sparacino
John J. Sparacino (SBN 18873700)
S. Margie Venus (SBN 20545900)
600 Travis Street, Suite 7000
Houston, Texas 77002
Telephone: (713) 485-7300
Facsimile (713) 485-7344
jsparacino@mckoolsmith.com
mvenus@mckoolsmith.com

Counsel for Three Dolphins, LLC

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Notice of Appearance and Request for Service of Papers was served by electronic delivery on all persons and entities receiving ECF notice in this case on August 30, 2023.

/s/ John J. Sparacino
John J. Sparacino

4881-5448-2557

3